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Before the
Federal Communications Commission
Washington, D.C. 20554
FCC Docket No. 93-136
PR Docket No. 93-59 /

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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In the Matter of
Amendment of the Commission's
Rules to allocate 449 Mhz
for wind profiler systems.

) FCC Docket No. 93-136
) ET Docket No. 93-59 /
)
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June 12, 1993

FEDERAL COMMUNICATIONS COMMISSION

5 **Active bands disrupted**

Further, we note that both of the proposed bands, 449 MHz and 915 MHz are very active and busy bands. Imposing the burden of an additional service on these bands will diminish the useability of the bands.

6 **Technical protection not supported in the docket**

Amateur Radio Service (ARS) frequency coordinators and repeater operators who are most affected by the proposals of this docket were not consulted during discussions on this matter. However, we understand that in discussion between the ARRL and the NTIA, commitments were made to protect ARS repeaters by the use of beam tilt, shielding and other technical means. Although we oppose this reallocation, we also feel that, should this docket be adopted, these commitments should be reflected in the service rules for wind profiler systems.

7 **Frequency Coordinator resource overlooked**

We note that the proposed docket would require notification of repeater operators listed in the ARRL repeater directory. While we agree with the notification requirement, we strongly recommend that local frequency coordinators also be contacted. Local frequency coordinators are listed in the same ARRL directory. They are the only resource that maintains a data base of operating systems, both published and un-published. The limited data contained in the ARRL repeater directory is obtained from these organizations. At best the repeater directory is 8 to 10 months out of date and does not contain un-published listings. Notification of the local frequency coordinators will provide access to the most current and accurate list of ARS operators.

Respectfully submitted,
The Oregon Packet Experimenters Network

By 
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President, OPEN